

1 Richard M. Valdez, Bar No. 156957
James G. Sandler, Bar No. 067407
2 **SANDLER, LASRY, LAUBE, BYER & VALDEZ LLP**
402 West Broadway, Suite 1700
3 San Diego, CA 92101-3542
Telephone (619) 235-5655
4 Facsimile (619) 235-5648
Email: rvaldez@slbv.com
5 E-mail: jsandler@slbv.com

6 Attorneys for Defendant
H. THOMAS MORAN, II, Court-Appointed
7 Receiver of LYDIA CAPITAL, LLC

8
9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

11 THE LINCOLN NATIONAL LIFE INSURANCE
12 COMPANY,

13 Plaintiff,

14 v.

15 H. THOMAS MORAN, II, Court-Appointed
Receiver of LYDIA CAPITAL, LLC,

16 Defendant.

Case No. 08-CV-00023-IEG-NLS

DEFENDANT H. THOMAS MORAN,
II'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD

17
18 Defendant, H. Thomas Moran, II ("Moran"), in accordance with Local Rule 12.1, moves the
19 Court to enter an Order extending Moran's deadline for filing his Answer to Plaintiff's Complaint, or
20 other responsive pleading, to March 31, 2008. In support of his Motion, Moran states as follows:

21 1. Plaintiff's Complaint was filed January 3, 2008. It was served upon Defendant on
22 January 30, 2008.

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24 2. Without the requested extension of time, Moran's Answer to Plaintiff's Complaint is
25 due March 18, 2008.

26 3. Moran has made no previous request for an extension of time in this case.

27 4. Plaintiff consents to the requested extension of time.

28 5. The requested extension of time will not impact other scheduled dates.

WHEREFORE, for good cause shown, Defendant, H. Thomas Moran, II, requests the Court to enter an Order extending Defendant's time to answer or otherwise plead to March 31, 2008.

Dated: March 18, 2008

By: /s/ Richard M. Valdez
Richard M. Valdez
Attorneys for Defendant
H. Thomas Moran, II, Court-Appointed
Receiver of Lydia Capital, LLC